

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR 05-1849 JH

RALPH GREENE,

Defendant.

**UNOPPOSED MOTION TO CONTINUE SENTENCING**

COMES NOW Ralph Greene through counsel Edward Bustamante and respectfully moves this honorable court issue an order vacating the July 26, 2011 sentencing currently set in this cause and reset the matter.

As grounds defense counsel states:

1. Counsel is in the process of preparing a sentencing memorandum in this matter. In preparation counsel has received multiple letters in support of Mr. Greene.
2. Defense counsel needs to distribute the letters to Federal Probation and the Office of the United States Attorney.
3. In addition Mr. Greene has several family members who live out-of-state who wish to attend the sentencing hearing.

4. Ralph Greene continues to be compliant with all conditions of release.
5. Defense counsel is exercising due diligence in preparing this matter as is the United States Attorney.
6. This motion is not for the purpose of delay.
7. Supervisory United States Attorney James Braun does not oppose this motion.

Based on the above, defense counsel respectfully moves the Court continue the July 26, 2011 sentencing.

Respectfully submitted by

/s/

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EDWARD O. BUSTAMANTE  
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This certifies a copy of this motion was electronically sent to James Braun, SUSA on July 24, 2011.

/s/

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EDWARD O. BUSTAMANTE